SOUTHERN DISTRICT OF NEW YORK	v
In re	x : Chapter 11
SEARS HOLDINGS CORPORATION, et al.,	: Case No. 18-23538 (RDD: (Jointly Administered)
Debtors. ¹	:
Sears Holdings Corp., et al.,	x :
Plaintiffs vs.	: :
Edward Scott Lampert, et al.,	: :
Defendants.	: Consolidated at x Adv. Pro. 19-08250 (RDI
Sears Holdings Corporation, et al.,	x
Plaintiffs	: :
vs. Andrew H. Tisch, et al.,	:
Defendants.	: :
	X

UNITED STATES BANKRUPTCY COURT

NOTICE OF FILING OF AMENDED EXHIBIT TO EXECUTED SETTLEMENT AGREEMENT

PLEASE TAKE NOTICE that on August 9, 2022, the Debtors and the Official Committee

of Unsecured Creditors of Sears Holdings Corporation (the "Creditors' Committee") filed the Joint

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification

(4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188);

number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); SR – Rover de Puerto Rico, LLC (f/k/a Sears, Roebuck de Puerto Rico, Inc.) (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Rover Brands Business Unit, LLC (f/k/a Sears Brands Business Unit Corporation) (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C.

Motion of Debtors and Official Committee of Unsecured Creditors for Entry of an Order Approving Settlement Agreements, Granting Certain Related Relief, and Authorizing Certain Nonmaterial Plan Modifications in Furtherance of the Effective Date of the Plan [Case No. 18-23538, ECF No. 10566; Case No. 19-08250, ECF No. 279] (the "Settlement Motion").²

PLEASE TAKE FURTHER NOTICE that on August 10, 2022, the Debtors and the Creditors' Committee filed the *Notice of Filing of Executed Settlement Agreement* [ECF No. 10579].

PLEASE TAKE FURTHER NOTICE that attached as <u>Exhibit 1</u> to the executed Settlement Agreement was a list of all Public Shareholder Defendants party to the Settlement Agreement (the "<u>Participating Public Shareholder Defendants</u>" and, the list of such defendants, the "Original List of Participating Public Shareholder Defendants").

PLEASE TAKE FURTHER NOTICE that on August 30, 2022, the Debtors and the Creditors' Committee filed the *Notice of Filing of Amended Exhibit to Executed Settlement Agreement* [ECF No. 10621], attached to which was an amended version of the Original List of Participating Public Shareholder Defendants (the "Amended List of Participating Public Shareholder Defendants").

PLEASE TAKE FURTHER NOTICE that attached hereto as <u>Exhibit A</u> is a further amended list of Participating Public Shareholder Defendants (the "<u>Further Amended List of Participating Public Shareholder Defendants</u>").

Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is c/o M-III Partners, LP, 1700 Broadway, 19th Floor, New York, NY 10019.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Settlement Motion, the Order (I) Confirming Modified Second Amended Joint Chapter 11 Plan of Sears Holdings Corporation and Its Affiliated Debtors and (II) Granting Related Relief [ECF No. 5370] or the Modified Second Amended Joint Chapter 11 Plan of Sears Holdings Corporation and Its Affiliated Debtors [ECF No. 5370-1] (the "Plan"), as applicable.

PLEASE TAKE FURTHER NOTICE that attached hereto as <u>Exhibit B</u> is a blackline of the Further Amended List of Participating Public Shareholder Defendants marked against the Amended List of Participating Public Shareholder Defendants.

PLEASE TAKE FURTHER NOTICE that attached hereto as <u>Exhibit C</u> is a blackline of the Further Amended List of Participating Public Shareholder Defendants marked against the Original List of Participating Public Shareholder Defendants.

Dated: September 6, 2022 New York, New York

/s/ Garrett Fail

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

New York, New York 10153 Telephone: (212) 310-8000 Facsimile: (212) 310-8007 Ray C. Schrock, P.C.

Garrett Fail

Garrett Fail
Sunny Singh

Counsel for the Debtors and Debtors in Possession

/s/ Ira S. Dizengoff

AKIN GUMP STRAUSS HAUER & FELD LLP

One Bryant Park

New York, New York 10036 Telephone: (212) 872-1000 Facsimile: (212) 872-1002

Ira S. Dizengoff Philip C. Dublin Sara L. Brauner Zachary D. Lanier

Counsel for the Official Committee of Unsecured Creditors

EXHIBIT A

Further Amended List of Participating Public Shareholder Defendants

EXHIBIT 1

List of Participating Public Shareholder Defendants (amended to include Additional Public Shareholder Defendants¹)

Participating Public Shareholder Defendant	Settlement Payment Amount	Law Firm / Counsel
T. Rowe Price Associates, Inc. (on behalf of T. Rowe Price High Yield Fund, T. Rowe Price Institutional High Yield Fund; T. Rowe Price Funds SICAV - Global High Yield Bond Fund; T. Rowe Price U.S. Equities Trust; T. Rowe Price Total Equity Market Index Fund; and T. Rowe Price Extended Equity Market Index Fund)	\$63,160.00	Morgan, Lewis & Bockius LLP
Ori Uziel	\$61,759.00	Morgan, Lewis & Bockius LLP
Blackrock Asset Management Ireland Limited BlackRock Inc. The Bank of New York Mellon (International) Limited, as Trustee of the Blackrock iShares UK Equity Index Fund (UK)	\$488,325.00	Morgan, Lewis & Bockius LLP
D. E. Shaw All Country Global Alpha Extension Portfolios, L.L.C.	\$809.00	Morgan, Lewis & Bockius LLP
D. E. Shaw All Country Global Alpha Plus Special Fund, L.P.	\$2,371.00	Morgan, Lewis & Bockius LLP
D. E. Shaw Kalon Portfolios, L.L.C.	\$20,104.00	Morgan, Lewis & Bockius LLP
D. E. Shaw Oculus Portfolios, L.L.C.	\$46,928.00	Morgan, Lewis & Bockius LLP
D. E. Shaw U.S. Broad Market Core Alpha Extension Portfolios, L.L.C.	\$8,538.00	Morgan, Lewis & Bockius LLP
D. E. Shaw U.S. Broad Market Core Alpha Extension Special Portfolios II (MA), L.L.C.	\$2,374.00	Morgan, Lewis & Bockius LLP
D. E. Shaw U.S. Broad Market Core Alpha Plus Special Fund, L.P.	\$10,671.00	Morgan, Lewis & Bockius LLP
D. E. Shaw U.S. Large Cap Core Alpha Extension Portfolios, L.L.C.	\$1,187.00	Morgan, Lewis & Bockius LLP
D. E. Shaw Valence Portfolios, L.L.C.	\$129,943.00	Morgan, Lewis & Bockius LLP
D. E. Shaw World Alpha Extension Portfolios, L.L.C.	\$3,436.00	Morgan, Lewis & Bockius LLP
Dekel Partners, L.P. Fine Offshore Partners, L.P. Fine Partners I, L.P.	\$469,061.00	Morgan, Lewis & Bockius LLP

¹ The Parties have acknowledged that a typographical error was made in Section 3(d) of the Agreement regarding the Certification to be made by Additional Public Shareholder Defendants. For the avoidance of doubt, such Certifications shall include the total number of shares of stock in Lands' End, Inc. and the total number of Seritage Growth Properties subscription rights that the Additional Public Shareholder Defendant or, as applicable, one or more of its Related Parties as set forth in such certification, received in connection with the transfers that are alleged in the Public Shareholder Action to be avoidable. All of the Additional Public Shareholder Defendants listed herein have been approved by the relevant Parties.

	T	
Noga Partners, L.P.		
Tapuz Partners, L.P.		
Sculptor Domestic Partners II LP		
Sculptor Domestic Partners, LP		
Sculptor Capital Investments, LLC (aka Sculptor Group	\$64,089.00	Morgan, Lewis & Bockius
fdba Och-Ziff Capital Management Group, LLC)	φοτ,002.00	LLP
Sculptor Capital Management, Inc. (fdba Och-Ziff Capital		
Management Group Inc., aka Oz Group)		
Force Capital II LLC		
Force Capital II Ltd	\$177,582.00	Morgan, Lewis & Bockius
Force Capital Ltd	\$177,362.00	LLP
Force Select Ltd		
The Vanguard Group, Inc., as Agent		
Vanguard Balanced Index Fund		
Vanguard Consumer Discretionary Index Fund		
Vanguard Extended Market Index Fund		
Vanguard Growth and Income Fund		
Vanguard Institutional Total Stock Market Index Fund		
Vanguard Large-Cap Index Fund		
Vanguard Mid-Cap Index Fund	* 455 * 40 * 00	Morgan, Lewis & Bockius
Vanguard Mid-Cap Index Portfolio	\$477,619.00	LLP
Vanguard Mid-Cap Value Index Fund		
Vanguard Small-Cap Index Fund		
Vanguard Small-Cap Value Index Fund		
Vanguard Tax-Managed Capital Appreciation Fund		
Vanguard Total Stock Market Index Fund		
Vanguard Total Stock Market Index Trust		
Vanguard Value Index Fund		
MOST DIVERSIFIED PORTFOLIO SICAV - TOBAM		Morgan, Lewis & Bockius
ANTIBENCHMARK GLOBAL EQUITY FUND	\$1,664.00	LLP
MOST DIVERSIFIED PORTFOLIO SICAV - TOBAM		Morgan, Lewis & Bockius
ANTI-BENCHMARK US EQUITY FUND	\$55,359.00	LLP
MOST DIVERSIFIED PORTFOLIO SICAV - TOBAM		Morgan, Lewis & Bockius
ANTI-BENCHMARK WORLD EQUITY FUND	\$24,441.00	LLP
Omega Advisors Inc.		
Omega Capital Investors, L.P.		
Omega Capital Partners, L.P.		Morgan, Lewis & Bockius
Omega Charitable Partnership, L.P.	\$107,288.00	LLP
Omega Equity Investors, L.P.		LEF
Omega Overseas Partners, Ltd		
Offiega Overseas Farthers, Ltd		Mangan Lawis & Backins
Karlin Holdings Limited Partnership	\$154,829.00	Morgan, Lewis & Bockius
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GSO Aiguille Des Grands Montets Fund I LP		
GSO Aiguille Des Grands Montets Fund II LP		
GSO Aiguille Des Grands Montets Fund III LP		
GSO Cactus Credit Opportunities Fund LP		
GSO Coastline Credit Partners LP		
GSO Credit Alpha Trading (Cayman) LP	\$419,624.00	Morgan, Lewis & Bockius
GSO Credit-A Partners LP	,	LLP
GSO Palmetto Opportunistic Investment Partners LP		
GSO Special Situations Fund LP		
GSO Special Situations Master Fund LP		
GSO Special Situations Overseas Fund Ltd		
Steamboat Credit Opportunities Master Fund LP		

Barclays Capital Inc.	¢154 941 00	Morgan, Lewis & Bockius
Barclays Capital Securities Limited	\$154,841.00	LLP
Barclays Capital Derivative Funding		
Fiam LLC Jonathan Chiel, as Trustee of the Fidelity Concord Street Trust	\$72,403.00	Morgan, Lewis & Bockius LLP
Gothic HSP Corporation	\$57,588.00	Morgan, Lewis & Bockius LLP
First Trust Consumer Discretionary Alphadex® Fund	\$40,661.00	Morgan, Lewis & Bockius LLP
HBOS Final Salary Pension Scheme	\$62,603.74	Allen & Overy LLP
SAC Capital Associates, LLC (n/k/a Point72 Associates, LLC)	\$259,842.75	Schulte Roth & Zabel LLP
Lockheed Martin Corporation Master Retirement Trust	\$7,895.37	Schulte Roth & Zabel LLP
MASON CAPITAL MGMT LLC	\$82,899.15	Schulte Roth & Zabel LLP
Kenden Alfond	\$1,901.33	Seward & Kissel LLP
AQR DELTA Fund, LP AQR DELTA Master Account, L.P. AQR DELTA Sapphire Fund, LP AQR DELTA XN Fund, LP	\$55,968.97	Greene Espel PLLP
Credit Suisse First Boston	\$1,893.57	Cahill Gordon & Reindel LLP
Credit Suisse Funds AG	\$531.71	Cahill Gordon & Reindel LLP
Horizon Spin-off and Corporate Restructuring Fund	\$11,160.70	K&L Gates LLP
Kinetics Portfolio Trust	\$142,275.67	K&L Gates LLP
Luma Capital S.A SPF	\$121,272.57	K&L Gates LLP
Prescott Associates L.P. Prescott General Partners LLC Prescott International Partners L.P. Prescott Investors, Inc.	\$82,412.25	K&L Gates LLP
Global Targeted Value Fund, a subfund of Dimensional Funds plc	\$4,168.67	Stradley Ronon Stevens & Young, LLP
U.S. Targeted Value Portfolio, a series of DFA Investment Dimensions Group Inc.	\$1,325.78	Stradley Ronon Stevens & Young, LLP
U.S. Core Equity 1 Portfolio, a series of DFA Investment Dimensions Group Inc.	\$22,730.91	Stradley Ronon Stevens & Young, LLP
U.S. Core Equity 2 Portfolio, a series of DFA Investment Dimensions Group Inc.	\$33,445.69	Stradley Ronon Stevens & Young, LLP
U.S. Sustainability Core 1 Portfolio, a series of DFA Investment Dimensions Group Inc.	\$1,025.09	Stradley Ronon Stevens & Young, LLP
U.S. Social Core Equity 2 Portfolio, a series of DFA Investment Dimensions Group Inc.	\$906.10	Stradley Ronon Stevens & Young, LLP
U.S. Large Cap Equity Portfolio, a series of DFA Investment Dimensions Group Inc.	\$555.25	Stradley Ronon Stevens & Young, LLP
VA U.S. Large Value Portfolio, a series of DFA Investment Dimensions Group Inc.	\$1,169.35	Stradley Ronon Stevens & Young, LLP
U.S. Vector Equity Portfolio, a series of DFA Investment Dimensions Group Inc.	\$10,580.74	Stradley Ronon Stevens & Young, LLP
Dimensional U.S. Core Equity 2 ETF, a series of Dimensional ETF Trust (into which T.A. U.S. Core Equity 2 Portfolio, a series of DFA Investment Dimensions Group Inc., was converted)	\$9,032.20	Stradley Ronon Stevens & Young, LLP
Dimensional U.S. Targeted Value ETF, a series of Dimensional ETF Trust (into which Tax-Managed U.S.	\$239.87	Stradley Ronon Stevens & Young, LLP

Total Settlement Payment from Participating Public Shareholder Defendants	\$4,288,515.75	
HAP Trading LLC	\$75,039.63	(brian.poronsky@katten.com) Shannon C. Gross (shannon.gross@katten.com) 525 West Monroe Street Chicago, Illinois 60661
GF Trading LLC	\$9,774.34	Katten Muchin Rosenman LLP Joel W. Sternman (j.sternman@katten.com) Brian J. Poronsky
RIEF RMP LLC	\$4,744.41	
RIEF Trading LLC	\$14,140.88	
SICAV State Street Banq, Paris State Street Bank & Trust Co. State Street Global Advisors State Street Global Advisors - FTSE RAFI DEV1000 INDX NL CTF State Street Global Advisors - SSCSIL SSGA EUT GBL DEV INX EQ	\$144,005.98	Morgan, Lewis & Bockius LLP
Goldman Sachs Profit Sharing Master Trust	\$5,098.00	Morgan, Lewis & Bockius LLP
including the following Additional Public Shareholder Defendants		
QIC Limited as Trustee for the Queensland Investment Trust No. 2 (incorrectly named in the public shareholder action as QIT2 IE DFA CORE MANDATE)	\$2,008.00	Jones Day
Dimensions Group Inc., was converted) Dimensional U.S. Equity ETF, a series of Dimensional ETF Trust (into which Tax-Managed U.S. Equity Series, a series of DFA Investment Dimensions Group Inc., was converted)	\$1,213.08	Stradley Ronon Stevens & Young, LLP
Targeted Value Portfolio, a series of DFA Investment		

EXHIBIT B

Blackline of Further Amended List of Participating Public Shareholder Defendants Against Amended List of Participating Public Shareholder Defendants

EXHIBIT 1

List of Participating Public Shareholder Defendants (amended to include Additional Public Shareholder Defendants¹)

Participating Public Shareholder Defendant	Settlement Payment Amount	Law Firm / Counsel
T. Rowe Price Associates, Inc. (on behalf of T. Rowe Price High Yield Fund, T. Rowe Price Institutional High Yield Fund; T. Rowe Price Funds SICAV - Global High Yield Bond Fund; T. Rowe Price U.S. Equities Trust; T. Rowe Price Total Equity Market Index Fund; and T. Rowe Price Extended Equity Market Index Fund)	\$63,160.00	Morgan, Lewis & Bockius LLP
Ori Uziel	\$61,759.00	Morgan, Lewis & Bockius LLP
Blackrock Asset Management Ireland Limited BlackRock Inc. The Bank of New York Mellon (International) Limited, as Trustee of the Blackrock iShares UK Equity Index Fund (UK)	\$488,325.00	Morgan, Lewis & Bockius LLP
D. E. Shaw All Country Global Alpha Extension Portfolios, L.L.C.	\$809.00	Morgan, Lewis & Bockius LLP
D. E. Shaw All Country Global Alpha Plus Special Fund, L.P.	\$2,371.00	Morgan, Lewis & Bockius LLP
D. E. Shaw Kalon Portfolios, L.L.C.	\$20,104.00	Morgan, Lewis & Bockius LLP
D. E. Shaw Oculus Portfolios, L.L.C.	\$46,928.00	Morgan, Lewis & Bockius LLP
D. E. Shaw U.S. Broad Market Core Alpha Extension Portfolios, L.L.C.	\$8,538.00	Morgan, Lewis & Bockius LLP
D. E. Shaw U.S. Broad Market Core Alpha Extension Special Portfolios II (MA), L.L.C.	\$2,374.00	Morgan, Lewis & Bockius LLP
D. E. Shaw U.S. Broad Market Core Alpha Plus Special Fund, L.P.	\$10,671.00	Morgan, Lewis & Bockius LLP
D. E. Shaw U.S. Large Cap Core Alpha Extension	\$1,187.00	Morgan, Lewis & Bockius

The Parties have acknowledged that a typographical error was made in Section 3(d) of the Agreement regarding the Certification to be made by Additional Public Shareholder Defendants. For the avoidance of doubt, such Certifications shall include the total number of shares of stock in Lands' End, Inc. and the total number of Seritage Growth Properties subscription rights that the Additional Public Shareholder Defendant or, as applicable, one or more of its Related Parties as set forth in such certification, received in connection with the transfers that are alleged in the Public Shareholder Action to be avoidable. All of the Additional Public Shareholder Defendants listed herein have been approved by the relevant Parties.

Portfolios, L.L.C.		LLP
D. E. Shaw Valence Portfolios, L.L.C.	\$129,943.00	Morgan, Lewis & Bockius LLP
D. E. Shaw World Alpha Extension	\$3,436.00	Morgan, Lewis & Bockius
Portfolios, L.L.C.	\$5,430.00	LLP
Dekel Partners, L.P.		
Fine Offshore Partners, L.P.		Morgan, Lewis & Bockius
Fine Partners I, L.P.	\$469,061.00	LLP
Noga Partners, L.P.		LLI
Tapuz Partners, L.P.		
Sculptor Domestic Partners II LP		
Sculptor Domestic Partners, LP		
Sculptor Capital Investments, LLC (aka Sculptor Group	\$64,089.00	Morgan, Lewis & Bockius
fdba Och-Ziff Capital Management Group, LLC)	\$04,089.00	LLP
Sculptor Capital Management, Inc. (fdba Och-Ziff Capital		
Management Group Inc., aka Oz Group)		
Force Capital II LLC		
Force Capital II Ltd	\$177,582.00	Morgan, Lewis & Bockius
Force Capital Ltd	\$177,362.00	LLP
Force Select Ltd		
The Vanguard Group, Inc., as Agent		
Vanguard Balanced Index Fund		
Vanguard Consumer Discretionary Index Fund		
Vanguard Extended Market Index Fund		
Vanguard Growth and Income Fund		
Vanguard Institutional Total Stock Market Index Fund		
Vanguard Large-Cap Index Fund		
Vanguard Mid-Cap Index Fund	\$477,619.00	Morgan, Lewis & Bockius
Vanguard Mid-Cap Index Portfolio	\$477,019.00	LLP
Vanguard Mid-Cap Value Index Fund		
Vanguard Small-Cap Index Fund		
Vanguard Small-Cap Value Index Fund		
Vanguard Tax-Managed Capital Appreciation Fund		
Vanguard Total Stock Market Index Fund		
Vanguard Total Stock Market Index Trust		
Vanguard Value Index Fund		
MOST DIVERSIFIED PORTFOLIO SICAV - TOBAM	\$1,664.00	Morgan, Lewis & Bockius
ANTIBENCHMARK GLOBAL EQUITY FUND	\$1,004.00	LLP
MOST DIVERSIFIED PORTFOLIO SICAV - TOBAM	\$55,359.00	Morgan, Lewis & Bockius
ANTI-BENCHMARK US EQUITY FUND	\$55,557.00	LLP
MOST DIVERSIFIED PORTFOLIO SICAV - TOBAM	\$24,441.00	Morgan, Lewis & Bockius
ANTI-BENCHMARK WORLD EQUITY FUND	Ψ24,441.00	LLP
Omega Advisors Inc.		
Omega Capital Investors, L.P.		
Omega Capital Partners, L.P.	\$107,288.00	Morgan, Lewis & Bockius
Omega Charitable Partnership, L.P.	Ψ107,200.00	LLP
Omega Equity Investors, L.P.		
Omega Overseas Partners, Ltd		
Karlin Holdings Limited Partnership	\$154,829.00	Morgan, Lewis & Bockius LLP
GSO Aiguille Des Grands Montets Fund I LP	\$419,624.00	Morgan, Lewis & Bockius
GSO Aiguille Des Grands Montets Fund II LP		LLP
GSO Aiguille Des Grands Montets Fund III LP		
GSO Cactus Credit Opportunities Fund LP		
GSO Coastline Credit Partners LP		

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\$72,403.00	Morgan, Lewis & Bockius
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\$57,588.00	LLP
	Morgan, Lewis & Bockius
\$40,661.00	LLP
\$62,603.74	Allen & Overy LLP
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\$259,842.75	Schulte Roth & Zabel LLP
\$7,895.37	Schulte Roth & Zabel LLP
	Schulte Roth & Zabel LLP
	Seward & Kissel LLP
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\$55,968.97	Greene Espel PLLP
	Cahill Gordon & Reindel
\$1,893.57	LLP
	Cahill Gordon & Reindel
\$531.71	LLP
\$11 160 70	K&L Gates LLP
	K&L Gates LLP
	K&L Gates LLP
\$121,272.37	R&L Gates LLI
\$82,412.25	K&L Gates LLP
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\$4,168.67	Stradley Ronon Stevens &
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\$1,325.78	Stradley Ronon Stevens &
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	\$72,403.00 \$57,588.00 \$40,661.00 \$62,603.74 \$259,842.75 \$7,895.37 \$82,899.15 \$1,901.33 \$55,968.97 \$11,160.70 \$142,275.67 \$121,272.57 \$82,412.25 \$4,168.67 \$1,325.78 \$22,730.91 \$33,445.69 \$1,025.09

Dimensions Group Inc.		Young, LLP
Dimensional U.S. Core Equity 2 ETF, a series of		Toung, DDI
Dimensional ETF Trust (into which T.A. U.S. Core		Stradley Ronon Stevens &
Equity 2 Portfolio, a series of DFA Investment	\$9,032.20	Young, LLP
Dimensions Group Inc., was converted)		Toung, LLI
Dimensional U.S. Targeted Value ETF, a series of		
Dimensional ETF Trust (into which Tax-Managed U.S.		Stradley Ronon Stevens &
Targeted Value Portfolio, a series of DFA Investment	\$239.87	Young, LLP
Dimensions Group Inc., was converted)		Toding, LLT
Dimensional U.S. Equity ETF, a series of Dimensional		
ETF Trust (into which Tax-Managed U.S. Equity Series, a		Stradley Ronon Stevens &
	\$1,213.08	
series of DFA Investment Dimensions Group Inc., was		Young, LLP
converted)		
QIC Limited as Trustee for the Queensland Investment	\$2,000,00	James Day
Trust No. 2 (incorrectly named in the public shareholder	\$2,008.00	Jones Day
action as QIT2 IE DFA CORE MANDATE)		
including the following		
Additional Public Shareholder Defendants		
Goldman Saaha Drofit Sharing Magter Trust	\$5,098.00	Morgan, Lewis & Bockius
Goldman Sachs Profit Sharing Master Trust	\$3,098.00	LLP
SICAV State Street Banq, Paris		
State Street Bank & Trust Co.		
State Street Global Advisors	\$143,863.23 \$144	Managan Lavvia & Dagleina
State Street Global Advisors - FTSE RAFI DEV1000		Morgan, Lewis & Bockius LLP
INDX NL CTF	<u>,005.98</u>	LLP
State Street Global Advisors - SSCSIL SSGA EUT GBL		
DEV INX EQ		
RIEF Trading LLC	\$14,140.88	
		W W 1' D
		Katten Muchin Rosenman
RIEF RMP LLC	\$4,744.41	LLP
		Joel W. Sternman
CDT 1' II C	ФО 774 24	(j.sternman@katten.com)
GF Trading LLC	\$9,774.34	Brian J. Poronsky
		(brian.poronsky@katten.com)
		Shannon C. Gross
		(shannon.gross@katten.com)
HAP Trading LLC	\$75,039.63	525 West Monroe Street
	.,.,	Chicago, Illinois 60661
Total Settlement Payment from	\$4,288,373.00	
Participating Public Shareholder Defendants	\$4,288,515.7 <u>5</u>	
Tarucipating rubite shareholder Detendants	ΨΤ94009313.13	

EXHIBIT C

Blackline of Further Amended List of Participating Public Shareholder Defendants Against Original List of Participating Public Shareholder Defendants

EXHIBIT 1

List of Participating Public Shareholder Defendants (amended to include Additional Public Shareholder Defendants)

Participating Public Shareholder Defendant	Settlement Payment Amount	Law Firm / Counsel
T. Rowe Price Associates, Inc. (on behalf of T. Rowe Price High Yield Fund, T. Rowe Price Institutional High Yield Fund; T. Rowe Price Funds SICAV - Global High Yield Bond Fund; T. Rowe Price U.S. Equities Trust; T. Rowe Price Total Equity Market Index Fund; and T. Rowe Price Extended Equity Market Index Fund)	\$63,160.00	Morgan, Lewis & Bockius LLP
Ori Uziel	\$61,759.00	Morgan, Lewis & Bockius LLP
Blackrock Asset Management Ireland Limited BlackRock Inc. The Bank of New York Mellon (International) Limited, as Trustee of the Blackrock iShares UK Equity Index Fund (UK)	\$488,325.00	Morgan, Lewis & Bockius LLP
D. E. Shaw All Country Global Alpha Extension Portfolios, L.L.C.	\$809.00	Morgan, Lewis & Bockius LLP
D. E. Shaw All Country Global Alpha Plus Special Fund, L.P.	\$2,371.00	Morgan, Lewis & Bockius LLP
D. E. Shaw Kalon Portfolios, L.L.C.	\$20,104.00	Morgan, Lewis & Bockius LLP
D. E. Shaw Oculus Portfolios, L.L.C.	\$46,928.00	Morgan, Lewis & Bockius LLP
D. E. Shaw U.S. Broad Market Core Alpha Extension Portfolios, L.L.C.	\$8,538.00	Morgan, Lewis & Bockius LLP
D. E. Shaw U.S. Broad Market Core Alpha Extension Special Portfolios II (MA), L.L.C.	\$2,374.00	Morgan, Lewis & Bockius LLP
D. E. Shaw U.S. Broad Market Core Alpha Plus Special Fund, L.P.	\$10,671.00	Morgan, Lewis & Bockius LLP
D. E. Shaw U.S. Large Cap Core Alpha Extension	\$1,187.00	Morgan, Lewis & Bockius

The Parties have acknowledged that a typographical error was made in Section 3(d) of the Agreement regarding the Certification to be made by Additional Public Shareholder Defendants. For the avoidance of doubt, such Certifications shall include the total number of shares of stock in Lands' End, Inc. and the total number of Seritage Growth Properties subscription rights that the Additional Public Shareholder Defendant or, as applicable, one or more of its Related Parties as set forth in such certification, received in connection with the transfers that are alleged in the Public Shareholder Action to be avoidable. All of the Additional Public Shareholder Defendants listed herein have been approved by the relevant Parties.

Portfolios, L.L.C.	1	LLP
D. E. Shaw Valence Portfolios, L.L.C.	\$129,943.00	Morgan, Lewis & Bockius LLP
D. E. Shaw World Alpha Extension Portfolios, L.L.C.	\$3,436.00	Morgan, Lewis & Bockius LLP
Dekel Partners, L.P. Fine Offshore Partners, L.P. Fine Partners I, L.P. Noga Partners, L.P. Tapuz Partners, L.P.	\$469,061.00	Morgan, Lewis & Bockius LLP
Sculptor Domestic Partners II LP Sculptor Domestic Partners, LP Sculptor Capital Investments, LLC (aka Sculptor Group fdba Och-Ziff Capital Management Group, LLC) Sculptor Capital Management, Inc. (fdba Och-Ziff Capital Management Group Inc., aka Oz Group)	\$64,089.00	Morgan, Lewis & Bockius LLP
Force Capital II LLC Force Capital II Ltd Force Capital Ltd Force Select Ltd	\$177,582.00	Morgan, Lewis & Bockius LLP
The Vanguard Group, Inc., as Agent Vanguard Balanced Index Fund Vanguard Consumer Discretionary Index Fund Vanguard Extended Market Index Fund Vanguard Growth and Income Fund Vanguard Institutional Total Stock Market Index Fund Vanguard Large-Cap Index Fund Vanguard Mid-Cap Index Fund Vanguard Mid-Cap Index Fund Vanguard Mid-Cap Index Fund Vanguard Small-Cap Value Index Fund Vanguard Small-Cap Index Fund Vanguard Small-Cap Value Index Fund Vanguard Tax-Managed Capital Appreciation Fund Vanguard Total Stock Market Index Fund Vanguard Total Stock Market Index Trust Vanguard Value Index Fund	\$477,619.00	Morgan, Lewis & Bockius LLP
MOST DIVERSIFIED PORTFOLIO SICAV - TOBAM ANTIBENCHMARK GLOBAL EQUITY FUND	\$1,664.00	Morgan, Lewis & Bockius LLP
MOST DIVERSIFIED PORTFOLIO SICAV - TOBAM ANTI-BENCHMARK US EQUITY FUND	\$55,359.00	Morgan, Lewis & Bockius LLP
MOST DIVERSIFIED PORTFOLIO SICAV - TOBAM ANTI-BENCHMARK WORLD EQUITY FUND	\$24,441.00	Morgan, Lewis & Bockius LLP
Omega Advisors Inc. Omega Capital Investors, L.P. Omega Capital Partners, L.P. Omega Charitable Partnership, L.P. Omega Equity Investors, L.P. Omega Overseas Partners, Ltd	\$107,288.00	Morgan, Lewis & Bockius LLP
Karlin Holdings Limited Partnership	\$154,829.00	Morgan, Lewis & Bockius LLP
GSO Aiguille Des Grands Montets Fund I LP GSO Aiguille Des Grands Montets Fund II LP GSO Aiguille Des Grands Montets Fund III LP GSO Cactus Credit Opportunities Fund LP GSO Coastline Credit Partners LP	\$419,624.00	Morgan, Lewis & Bockius LLP

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GSO Credit Alpha Trading (Cayman) LP		
GSO Credit-A Partners LP		
GSO Palmetto Opportunistic Investment Partners LP GSO		
Special Situations Fund LP		
GSO Special Situations Master Fund LP		
GSO Special Situations Overseas Fund Ltd		
Steamboat Credit Opportunities Master Fund LP		
Barclays Capital Inc.		Morgan, Lewis & Bockius
Barclays Capital Securities Limited	\$154,841.00	LLP
Barclays Capital Derivative Funding		EE
Fiam LLC		Morgan, Lewis & Bockius
Jonathan Chiel, as Trustee of the Fidelity Concord Street	\$72,403.00	LLP
Trust		
Gothic HSP Corporation	\$57,588.00	Morgan, Lewis & Bockius
Gotine Hor Corporation	Ψ37,300.00	LLP
First Trust Consumer Discretionary Alphadex® Fund	\$40,661.00	Morgan, Lewis & Bockius
		LLP
HBOS Final Salary Pension Scheme	\$62,603.74	Allen & Overy LLP
SAC Capital Associates, LLC (n/k/a Point72 Associates,	\$259,842.75	Schulte Roth & Zabel LLP
LLC)	,	
Lockheed Martin Corporation Master Retirement Trust	\$7,895.37	Schulte Roth & Zabel LLP
MASON CAPITAL MGMT LLC	\$82,899.15	Schulte Roth & Zabel LLP
Kenden Alfond	\$1,901.33	Seward & Kissel LLP
AQR DELTA Fund, LP		
AQR DELTA Master Account, L.P.	\$55,968.97	Greene Espel PLLP
AQR DELTA Sapphire Fund, LP	ψ33,900.91	Greene Espert ELI
AQR DELTA XN Fund, LP		
Credit Suisse First Boston	\$1,893.57	Cahill Gordon & Reindel
Credit Buisse I list Boston	Ψ1,0/3.37	LLP
Credit Suisse Funds AG	\$531.71	Cahill Gordon & Reindel
	ψ331.71	LLP
Horizon Spin-off and Corporate Restructuring Fund	\$11,160.70	K&L Gates LLP
Kinetics Portfolio Trust	\$142,275.67	K&L Gates LLP
Luma Capital S.A SPF	\$121,272.57	K&L Gates LLP
Prescott Associates L.P.		
Prescott General Partners LLC	\$82,412.25	K&L Gates LLP
Prescott International Partners L.P.	\$62,412.23	R&L Gales LLP
Prescott Investors, Inc.		
Global Targeted Value Fund, a subfund of Dimensional	¢4 160 67	Stradley Ronon Stevens &
Funds plc	\$4,168.67	Young, LLP
U.S. Targeted Value Portfolio, a series of DFA	¢1 225 70	Stradley Ronon Stevens &
Investment Dimensions Group Inc.	\$1,325.78	Young, LLP
U.S. Core Equity 1 Portfolio, a series of DFA Investment	\$22.720.01	Stradley Ronon Stevens &
Dimensions Group Inc.	\$22,730.91	Young, LLP
U.S. Core Equity 2 Portfolio, a series of DFA Investment	\$22.44F.CO	Stradley Ronon Stevens &
Dimensions Group Inc.	\$33,445.69	Young, LLP
U.S. Sustainability Core 1 Portfolio, a series of DFA	¢1 025 00	Stradley Ronon Stevens &
Investment Dimensions Group Inc.	\$1,025.09	Young, LLP
U.S. Social Core Equity 2 Portfolio, a series of DFA	\$006.10	Stradley Ronon Stevens &
Investment Dimensions Group Inc.	\$906.10	Young, LLP
U.S. Large Cap Equity Portfolio, a series of DFA	\$555.25	Stradley Ronon Stevens &
Investment Dimensions Group Inc.	φυυυ.Δυ	Young, LLP
VA U.S. Large Value Portfolio, a series of DFA	\$1 160 25	Stradley Ronon Stevens &
Investment Dimensions Group Inc.	\$1,169.35	Young, LLP
U.S. Vector Equity Portfolio, a series of DFA Investment	\$10,580.74	Stradley Ronon Stevens &
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Dimensions Group Inc.		Young, LLP
Dimensional U.S. Core Equity 2 ETF, a series of		Tourig, EEF
Dimensional ETF Trust (into which T.A. U.S. Core		Stradley Ronon Stevens &
Equity 2 Portfolio, a series of DFA Investment	\$9,032.20	Young, LLP
Dimensions Group Inc., was converted)		Tourig, LEI
Dimensional U.S. Targeted Value ETF, a series of		
Dimensional ETF Trust (into which Tax-Managed U.S.		Stradley Ronon Stevens &
Targeted Value Portfolio, a series of DFA Investment	\$239.87	Young, LLP
Dimensions Group Inc., was converted)		Toung, EEF
Dimensional U.S. Equity ETF, a series of Dimensional		
ETF Trust (into which Tax-Managed U.S. Equity Series, a		Stradley Ronon Stevens &
series of DFA Investment Dimensions Group Inc., was	\$1,213.08	Young, LLP
converted)		Tourig, EEF
QIC Limited as Trustee for the Queensland Investment		
Trust No. 2 (incorrectly named in the public shareholder	\$2,008.00	Jones Day
action as QIT2 IE DFA CORE MANDATE)	Ψ2,000.00	Jones Day
including the following		
Additional Public Shareholder Defendants		
Additional Fubric Shareholder Dejendants		
Goldman Sachs Profit Sharing Master Trust	\$5,098.00	Morgan, Lewis & Bockius
		LLP
SICAV State Street Bang, Paris		
State Street Bank & Trust Co.		
State Street Global Advisors	** * * * * * * * * * * * * * * * * * *	Morgan, Lewis & Bockius
State Street Global Advisors - FTSE RAFI DEV1000	<u>\$144,005.98</u>	LLP
INDX NL CTF		
State Street Global Advisors - SSCSIL SSGA EUT GBL		
_DEV INX EQ		
DIEC Trading LLC	¢14 140 00	
RIEF Trading LLC	<u>\$14,140.88</u>	
		Katten Muchin Rosenman
DVIII DVIII G	A = 1 1 11	LLP
RIEF RMP LLC	<u>\$4,744.41</u>	Joel W. Sternman
		(j.sternman@katten.com)
GF Trading LLC	\$9,774.34	Brian J. Poronsky
		(brian.poronsky@katten.com)
		Shannon C. Gross
		(shannon.gross@katten.com)
HADEL II LLC	Φ 7 5 020 62	525 West Monroe Street
HAP Trading LLC	<u>\$75,039.63</u>	Chicago, Illinois 60661
m . 10 . 2	44.02 74. 2	
Total Settlement Payment from	\$4 ,035,712.51 <u>4,28</u>	
Participating Public Shareholder Defendants	8,515.75	